



November 22, 2016

Tom Montoya, Forest Supervisor
1550 Dewey Avenue, Suite A
Baker City, OR 97814

Dear Tom,

Thank you for your September 27, 2016 letter regarding the Lostine corridor project. While we appreciate you taking the time to respond to our concerns, your letter fails to acknowledge the issues we have raised throughout the development of the project and instead continues to justify the inappropriate use of a Farm Bill Categorical Exclusion (CE) to push through a controversial project by misrepresenting the collaborative nature of the project.

I am writing to clarify some of the misconceptions that your letter contained with the hopes of being able to have a productive conversation in the future that addresses our wider concerns regarding the Wallowa-Whitman's misrepresentations around collaboration. It has never been our position that, in order to meet the requirements of a Section 603 CE under HFRA as amended by the Agriculture Act of 2014, a project must go through a formal collaborative group such as the Wallowa-Whitman Forest Collaborative. Rather, we have asked the agency to adhere to the definition of collaboration as contained in Section 603. That statute requires a CE project authorized under Section 603 to "be developed in a collaborative process that includes multiple interested persons representing diverse interests and is transparent and non-exclusive."

Your letter states that the forest has involved multiple interested person representing diverse interest and conducted a process that is transparent and nonexclusive. Simply stating that the process has been transparent and nonexclusive does not mean that it has been. If that were that case, why were no conservation interests involved in the development of this project? The district developed the project and then informed us, other conservation stakeholders and the wider the public, about what it planned to do in the river corridor. Our feedback on the project was never acknowledged or considered as the project moved forward.

In your letter you also assert that the Wallowa Valley District reached out to Hells Canyon Preservation Council prior to scoping to invite our participation. The only contact we had with the district prior to scoping was a phone call from Assistant Ranger Lubera letting us know that scoping was forthcoming. At that time we were not invited to participate in a collaborative effort or help develop the project in any manner. Nor was it clear that this project would be authorized under a CE. At that time we were told that, depending on comments coming out of scoping, the project could be analyzed as a CE or an EA.

Finally, your letter states that even though we were given the opportunity to provide the district design input we failed to do so. Our concerns with the project do not have to do with design elements such as timing of logging or location of roads. Rather, as outlined in our scoping comments, we strongly believe that certain controversial aspects of the project should be dropped altogether. While we support some activities proposed by the project – creation of defensible spaces directly adjacent to historical buildings and other infrastructure, danger tree removal and creation of safer egress/ingress routes for firefighters – other aspects of the project are not supported by best available science and are unlikely to meet the stated purpose and need of the project. For example, as acknowledged by the project’s forester during a field trip hosted by the district, the approximately 800 acres of proposed logging within old growth moist and cold forests will not reduce fire intensity should a wildfire occur in the corridor under normal fire conditions.

Despite raising our concerns regarding certain aspects of the Lostine Project with the district and forest multiple times, our specific project related concerns have yet to even be acknowledged. As for the process under which the project was developed, when we last met with Ranger Stein and Assistant Ranger Lubera they apologized that we felt left out of the process. Our grievance is not about “feeling left out;” it is about the agency meeting its obligation under the law to develop projects in a transparent and non-exclusive manner.

We firmly believe the Wallowa-Whitman National Forest and Hells Canyon Preservation Council share common goals to foster more resilient and adaptive ecosystems on our public lands. However, in our experience over the past few years, it has become increasingly difficult to work with the forest toward these common goals. We find the forest has become less transparent in its processes; does not adhere to governing laws and regulations; cuts corners on public involvement; and, misrepresents Hells Canyon Preservation Council’s and other stakeholder’s involvement in the development of projects such as the Lostine.

Because of this dynamic with the forest and specifically with the Wallowa Valley Ranger District, we are increasingly concerned about our ability to work in cooperative and constructive ways to meet our shared goals of a resilient and adaptive Wallowa-Whitman National Forest. Your careful consideration and attention to our concerns will go far in ensuring a strong and constructive working relationship between the Wallowa-Whitman National Forest and Hells Canyon Preservation Council exists going forward.

Sincerely,



Veronica Warnock
Conservation Director

Cc: Kris Stein, Mary Gautreaux, Kathleen Cathey, Karen Wagner